

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Bradley Hieronymus,)
)
 Plaintiff,)
)
 vs.)
)
 Felix Barron, Ph.D., individually and in)
 his official capacity as an employee of)
 Clemson University; Alesia Smith,)
 Executive Director for Equity Compliance))
 Title IX Coordinator, in her individual)
 capacity and in her official capacity as an)
 employee of Clemson University;)
 Clemson University; and the Board of)
 Trustees of Clemson University)
)
 Defendants.)

NOTICE OF REMOVAL

TO: JOHN G. RECKENBEIL, ESQ. AND JEFFREY D. EZELL, ESQ., ATTORNEYS FOR PLAINTIFF; AND P. CHRISTOPHER SMITH, JR., ESQ. AND JAMES P. WALSH, ESQ., ATTORNEYS FOR DEFENDANT, FELIX BARRON:

YOU WILL PLEASE TAKE NOTICE that the Defendants, Clemson University, Alesia Smith, and the Board of Trustees of Clemson University, remove the above-captioned case from the Circuit Court of Oconee County, South Carolina, into the United States District Court, District of South Carolina, Anderson Division. This removal is proper on the following grounds:

1. A civil action has been commenced and is now pending in the Circuit Court of Oconee County, State of South Carolina, styled *Bradley Hieronymus v. Felix Barron, et al.*, Civil Action Number 2019-CP-37-00282.

2. The Defendants are entitled to removal of the aforesaid to this Court because the Complaint raises allegations arising under the Constitution and laws of the United States as contemplated by 28 U.S.C. § 1331.

3. This action was commenced by service of the Summons and Complaint, attached hereto as Exhibit A, effectuated by Proof of Service on May 28, 2019, attached hereto as Exhibit

B. Pursuant to 28 U.S.C. § 1446, this Notice of Removal is filed within thirty (30) days of service upon these Defendants of the initial pleadings setting forth the claim upon which relief is requested. These Defendants will file an Answer as provided by law.

4. The Honorable Beverly H. Whitfield, Oconee County Clerk of Court, has been provided a copy of this Notice of Removal.

WHEREFORE, these Defendants give notice that the aforesaid action is removed from the Circuit Court of Ocoee County, State of South Carolina, and to this Court for trial and determination.

WILLSON JONES CARTER & BAXLEY, P.A.

BY: /s/Charles F. Turner, Jr.
Charles F. Turner, Jr. (Fed. ID #5849)
Wilson S. Sheldon (Fed. ID #5464)
872 South Pleasantburg Drive
Greenville, SC 29607
Phone: 864-672-3711
Fax: 864-373-7055

*Attorneys for the Defendants,
Clemson University, Alesia Smith and
The Board of Trustees of Clemson University*

Greenville, South Carolina

June 14, 2019